

LAW OFFICES OF BING LI, LLC  
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Attorneys for Defendant  
Grand Sichuan International 24 Inc.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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JORGE ANTONIO, SERGIO GOMEZLUIS,  
ROGELIO MORALES, ALEJANDRO MELCHOR,  
ALEJANDRO LOPEZ, ISMAEL GOMEZ, and  
EUSEBIO MORALES, individually an don behalf  
of other similarly stated,

07 Civ. 6513 (PKC) (THK)

Plaintiffs,

-against-

**DECLARATION OF  
BING LI IN SUPPORT  
OF MOTION TO  
WITHDRAW AS COUNSEL**

GRAND SICHUAN INTERNATIONAL 24 INC.  
d/b/a GRAND SICHUAN INTERNATIONAL,  
GRAND SICHUAN INTERNATIONAL, INC.,  
GRAND SICHUAN INT'L MIDTOWN, INC.,  
GRAND SICHUAN WESTERN CORP.,  
GRAND SICHUAN INT'L ST. MARKS, INC.,  
GRAND SICHUAN INT'L EASTERN, INC., and  
XIAO TU ZHANG, and GUANG JUN LI,

Defendants.

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BING LI, an attorney duly admitted to practice before this Court, declares under the  
penalty of perjury as follows:

1. I am a member of the LAW OFFICES OF BING LI, LLC, attorney of record  
for defendant GRAND SICHUAN INTERNATIONAL 24, INC. ("Sichuan 24") and  
respectfully submit this declaration in support of the instant motion for an Order pursuant to  
Rule 1.4 of the Local Rules of the Southern and Eastern District of New York (2008)

relieving the undersigned as counsel for Defendant Sichuan 24 and for such other and further relief as the Court may deem just and proper.

2. The reason for the requested relief is Defendant Sichuan 24's notice of discharge and its intention to seek new counsel in substitution of the undersigned.

3. New York Lawyers' Code of Professional Responsibility (Dec. 2007) provides for the basis for mandatory withdrawal when, inter alia, "[t]he lawyer is discharged by his or her client." DR 2-110 B(4) (22 N.Y.C.R.R. § 1200.15 (B)(4)).

4. The case is still in its discovery phase and pursuant to the Court's Civil Case Management Plan and Scheduling Order (the "Order"), the discovery cutoff date is April 25, 2008.

5. Magistrate Judge Katz set the matter for a settlement conference initially for March 6, 2008, which was adjourned at Defendant Sichuan 24's request to March 17, 2008. This conference was then rescheduled today due to the event that occurred.

6. Accordingly, the Court is requested to grant the within motion relieving the undersigned as counsel for Defendant Sichuan 24.

7. The Court is further requested to afford Defendant Sichuan 24 a reasonable time period in which to seek appearance of new counsel and such other relief as the Court may deem just and proper.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Respectfully submitted,

Executed on March 17, 2008  
New York, New York

/s/ \_\_\_\_\_  
Bing Li (BL 5550)